



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

June 12, 2025

BY ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *State of New York et al. v. U.S. Department of Education et al.*,
No. 25 Civ. 2990 (ER)

Dear Judge Ramos:

This Office represents defendants in the above-referenced matter. We write respectfully to request a 26-day extension of time, from June 13, 2025, to July 9, 2025, to respond to the Complaint. The reason for this request is that the Government has appealed the Court's June 3 Preliminary Injunction Order, and has moved in the Second Circuit for a stay of that Order pending resolution of the appeal. The Second Circuit has set an expedited briefing schedule for the Government's motion to stay, and has placed the motion on the Court's June 17, 2025 calendar. Because the Circuit's ruling on the Government's motion may well affect the Government's response to the Complaint and, more generally, how the parties wish to proceed, we believe it would be most efficient to delay the Government's time to respond to the Complaint until after the Circuit has issued a decision on the Government's motion to stay.

In addition, we are requesting additional time to respond to the Complaint because I will be traveling internationally to visit family from June 19 to July 5. We thus respectfully request that our response be due the week after I return. This is the Government's first request for an extension of time regarding its response to the Complaint. Plaintiffs consent to this request.

We thank the Court for its consideration of this request.

MEMO ENDORSED

The request is granted. Defendants are hereby ordered to respond to the Complaint by July 9, 2025.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos", is written over a horizontal line.

Edgardo Ramos, U.S.D.J.
Dated: June 12, 2025
New York, New York

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Dana Walsh Kumar
CHARLES S. JACOB
DANA WALSH KUMAR
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007
Tel.: (212) 637-2725 / 2741
dana.walsh.kumar@usdoj.gov
charles.jacob@usdoj.gov

cc: *Plaintiffs' counsel* (by ECF)